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April 19, 2024

Via ECF & FACSIMILIE

Honorable Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Laura Pellegrino v. BJ's Wholesale Club, Inc.*
Docket No.: 7:22-cv-4805 (NSR)(VR)
Our File No: 8282.0088393

Honorable Sir:

We represent defendants BJ's Wholesale Club, Inc. ("BJ's"), in the above-referenced matter.

Pursuant to Rule 1.E of your individual practices and your Court Directive of March 26, 2024, we write to request a thirty-day extension to the briefing schedule delineated in the March 26, 2024, directive due to an unforeseen medical issue. As per the aforementioned schedule:

(1) Defendants' moving papers are to be served (not filed) on April 25, 2024; (2) Plaintiffs' opposition papers are to be served (not filed) on May 29, 2024; and (3) Defendants' reply papers are to be served on June 13, 2024. All motion papers are to be filed by the parties on the reply date, June 13, 2024."

With a thirty-day extension the new schedule would read:

(1) Defendants' moving papers are to be served (not filed) on May 28, 2024¹; (2) Plaintiffs' opposition papers are to be served (not filed) on June 28, 2024; and (3) Defendants' reply papers are to be served on July 15, 2024². All motion papers are to be filed by the parties on the reply date, July 15, 2024.

¹ Thirty days exactly from April 25, 2024, falls during the Memorial Day holiday.

² Thirty days exactly from June 13, 2024, falls on Saturday, July 13, 2024.

MEMO ENDORSED

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Regarding compliance with the requirements of 1.E:

- (1) The original date(s): *See above*;
- (2) The number of previous requests for adjournment or extension: *None*;
- (3) Whether 2 these previous requests were granted or denied: *N/A, see #3*;
- (4) The reason for the instant request: *Unforeseen medical issue*;
- (5) Whether the adversary consents: *On April 18, 2024, Plaintiff's Counsel consented to this extension during a teleconference with this office; and*
- (6) If the adversary consents, three mutually agreeable alternate conference dates, which should be on a Thursday or Friday. Any request for adjournments of conferences shall be made at least 48 hours prior to the scheduled appearance. If the requested adjournment or extension affects any other scheduled dates, a proposed Revised Scheduling Order must be attached: *This request is made more than 48 hours prior to the service deadline of April 25, 2024.*

Thank you for your time and consideration.

CHARTWELL LAW

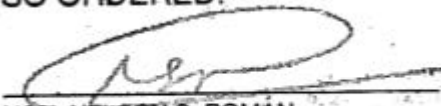
By: Justin Domenech
Justin Domenech

cc: FV Kelly, Esq. (via ECF & Email)

Def's request, consented to by Pltf., is GRANTED. The briefing schedule is revised as follows: Defendants' moving papers are to be served (not filed) on May 28, 2024; (2) Plaintiffs' opposition papers are to be served (not filed) on June 28, 2024; and (3) Defendants' reply papers are to be served on July 15, 2024. All motion papers are to be filed by the parties on the reply date, July 15, 2024. The parties are further directed to deliver Chambers two hardcopies and an electronic copy of their papers as they are served.

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 39.

**Dated: April 19, 2024
White Plains, NY**

SO ORDERED:

**HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE**